

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JAVIER MONGE,

Case: 1:21-CV-07664-JPC

Plaintiff,

-against-

JOHNNY B'S REALTY, LLC and RUGO, LLC,

Defendants.  
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**DEFENDANTS' COUNSELS' MOTION TO WITHDRAW AS ATTORNEY,  
FOR A SIXTY-DAY STAY FOR DEFENDANT TO RETAIN NEW COUNSEL**

Pursuant to Local Civil Rule 1.4, and in accordance with the Court's Part Rule 4(B), HAMRA LAW GROUP, P.C. ("HLG"), current counsel for Defendant, RUGO, LLC, moves this Court for an Order granting permission to withdraw as counsel to Defendant, RUGO, LLC, and for a 60-day stay for Defendant to retain new counsel.

Counsel and Defendant find themselves at an impasse in the litigation process and Defendant has consented and requested the within application.

The details of these issues are set forth in a proposed Declaration of Kevin S. Johnson, Esq., in Support of Motion to Withdraw.

In conjunction with this application, I also request a 60-day stay, if the request to be relieved is granted, to allow Defendant to retain new counsel.

WHEREFORE, I respectfully request that HAMRA LAW GROUP, P.C.'s within motion be granted in its entirety, and for such other and further relief as the Court may deem just and proper.

Dated: Great Neck, New York  
September 29, 2022

Plaintiff shall respond to Defendant's Counsel's motion to withdraw as attorney for Defendant and for a sixty-day stay by October 11, 2022.

SO ORDERED.

October 5, 2022  
New York, New York



JOHN P. CRONAN  
United States District Judge

HAMRA LAW GROUP, P.C.

*Kevin S. Johnson*

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